

TRANSMITTAL

Date: 12 November 1999

From: Lynn Marie Hornecker *LMH*

To: **Ms. Alice Gimeno**
State of California Environmental Protection Agency
Department of Toxic Substances Control, Region 4
Site Mitigation Branch
Base Closure Unit
5796 Corporate Avenue
Cypress, CA 90630

Subj: Phantom Temporary Accumulation Area (TAA) Sites 29A and 29B
Marine Corps Air Station, El Toro

Provided for your information as enclosure (1) is documentation for Phantom Temporary Accumulation Area (TAA) Sites 29A and 29B that supports the deletion of these non-existent (or phantom) Environmental Locations of Concern (LOCs) from the next Base Realignment and Closure Cleanup Plan (BCP) update for the Marine Corps Air Station, El Toro.

TAA 29A was reportedly located northwest of Building 29, and TAA 29B was reportedly located southwest of Building 29 in the northwest section of the Station near West Marine Way and South 8th Street. Building 29, now vacant, was formerly utilized as a field office for the Navy Investigative Service (NIS) and as a storage facility. The phantom sites are located in close proximity to or within the investigation boundaries of Installation Restoration Program (IRP) Site 15 – Suspended Fuel Tanks.

TAA 29A and TAA 29B were identified as Solid Waste Management Unit (SWMU) Number 30 and SWMU Number 31, respectively, in the "Final Resource Conservation and Recovery Act (RCRA) Facility Assessment Report" (Jacobs Engineering Group, Inc., 1993). TAA 29A and TAA 29B were originally identified on a California Department of Health Services (DHS) photograph taken in 1980 according to the information acquired during the Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA).

The RFA documentation indicates that TAA 29A (SWMU 30) was located immediately adjacent to the northwest side of the southwest end of Building 29. The location of TAA 29A (SWMU 30) coincides with the location of a concrete pad, approximately 30 feet long and 12 feet wide, that was used by the NIS for temporary storage of impounded vehicles.

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The RFA documentation does not include a photograph or detailed map showing the location of TAA 29B (SWMU 31), however, the RFA Report indicates that TAA 29B is located within the investigation boundary of IRP Site 15 – Suspended Fuel Tanks – located southwest of Building 29. Soil and ground water samples have been collected at IRP Site 15 during the Phase I and Phase II Remedial Investigations, and shallow soils were removed from the former IRP Site 15, Unit 1 (Stained Areas) under the petroleum corrective action program.

We acquired and reviewed historical records and environmental program management plans and reports and we conducted visual inspections of the sites. Based upon the absence of documentation identifying the exterior storage of hazardous materials, the absence of evidence of generation of hazardous wastes at Building 29, and the results of the visual inspections, we have determined that these sites do not exist or that the sites were incorrectly designated as LOCs. We propose to consider these sites as phantom (or non-existent) LOCs and we propose to delete these sites from the next Base Realignment and Closure Cleanup Plan (BCP) update.

If we do not receive comments from you within thirty days of receipt of this document, then we will assume that you concur with our conclusions and we will continue our evaluation of LOCs. A formal transmittal letter may follow.

If you have questions, please call me at (619) 532-4162.

Enclosure:

Documentation for Phantom TAA Sites 29A and 29B (SWDIV, November 1999)

Copy to:

Mr. Glenn Kistner (U. S. EPA) w/o encl

Ms. Patricia Hannon (RWQCB, Santa Ana Region) w/o encl

Mr. Dean Gould (MCAS El Toro) w/encl

Project File

ENCLOSURE

TECHNICAL MEMORANDUM
PHANTOM TEMPORARY ACCUMULATION AREA (TAA)
SITES 29A AND 29B

DATED 01 NOVEMBER 1999

THIS RECORD IS ENTERED IN THE DATABASE AND FILED
AS

RECORD NO. M60050_003800